

2. **Procedural Motions and other Pending Matters.** There are no pending motions currently before the Court.

3. **Schedule for Discovery.** The parties have agreed on the following case schedule:

<u>Event</u>	<u>Agreed Deadline</u>
Fed.R.Civ.P. 26(a)(1) ⁽¹⁾ -(D) disclosures ^	August 7, 2011 August 9, 2011 with supplements taken as necessary
Plaintiff's expert reports (Fed.R.Civ.P. 26(a)(2))	October 15, 2011 October 17, 2011
Motions to add parties or amend pleadings	October 22, 2011 October 24, 2011
Defendant's expert reports (Fed.R.Civ.P. 26(a)(2))	December 16, 2011
Close of discovery (except expert discovery)	December 16, 2011
Summary judgment motions must be filed by	January 30, 2012
Close of expert discovery	January 30, 2012
All other motions, excluding motions in limine	February 15, 2012

4. **Discovery Limits.** The parties have agreed that all discovery requests must be propounded no later than 33 days prior to the close of discovery. Each party shall reserve its or his right to seek by motion additional discovery, with good cause shown.

5. **Settlement.** The parties have agreed that settlement is likely, but do not at this time request a settlement conference before a Magistrate Judge.

6. **Trial by Magistrate Judge.** The parties consent to trial by a Magistrate Judge.

7. **Modification of Schedule.** All dates set forth herein may be modified by written agreement of the parties and approval of the Court, or upon motion of the Court for good cause shown.

Respectfully submitted,

COUNSEL FOR PLAINTIFF:

/s/Lawrence A. Fuller

Lawrence A. Fuller, Esq., *pro hac vice*
FULLER, FULLER & ASSOCIATES, P.A.
12000 Biscayne Blvd., Suite 609
North Miami, FL 33181
Telephone: (305) 891-5199
Facsimile: (305) 893-9505
lfuller@fullerfuller.com

and

Jonathan A. Street, Esq., TN Bar 021712
HIGGINS, HIMMELBERG AND PILIPONIS
116 Third Avenue, South
Nashville, TN 37201
Telephone: (615) 353-0930
Facsimile: (615) 216-8372
street@hhpfirm.com

COUNSEL FOR DEFENDANT:

/s/Mark A. Nobles

Mark A. Nobles, Esq., TN Bar
NOBLES LAW GROUP, PLLC
611 N. Maple Street
Murfreesboro, TN 37130
Telephone: (615) 907-8464
Facsimile: (615) 250-4819
mark@nlgpllc.com

SO ORDERED, this _____ day of _____, 2011, in Nashville, Tennessee.


UNITED STATES MAGISTRATE JUDGE
JULIE E. GRIFFIN